

# **EXHIBIT A**

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*Attorneys for Defendants Thomson SA and  
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**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION**

IN RE CATHODE RAY TUBE (CRT)  
 ANTITRUST LITIGATION,

No. 07-cv-5944-JST  
 MDL No. 1917

This Document Relates to:

**DECLARATION OF MEGGAN EHRET**

*Sharp Electronics Corp., et al. v. Hitachi  
 Ltd., et al.*, No. 13-cv-1173;  
*Sears, Roebuck & Co., et al. v. Chunghwa  
 Picture Tubes, Ltd., et al.*, No. 11 -cv-05514

Judge: Hon. Jon S. Tigar

I, Meggan Ehret, hereby declare as follows:

1. I am currently General Counsel, Litigation and Compliance for Thomson Consumer Electronics, Inc., a wholly-owned subsidiary of Thomson SA (collectively "Thomson"). The statements contained in this declaration are based on my personal knowledge and, if called as a witness, I could competently testify to the following facts.
2. I submit this declaration in support of the Thomson and Technologies Displays America, LLC ("TDA") Defendants' Notice of Motion and Motion to Continue and Set Trial Dates.

1 3. In early April 2016, I was diagnosed with a very serious illness. Although I am still  
2 undergoing medical tests and consulting with my doctors to determine the exact course of my  
3 treatment, it is expected that during the next several months I will be undergoing several surgeries  
4 and other invasive medical treatments and procedures.

5 4. It is also expected that these procedures will, at times, be debilitating, prevent me from  
6 working, and necessitate an extensive recovery period.

7 5. As a result of my illness, it is unlikely that I will be sufficiently recovered from my  
8 upcoming medical procedures to participate in a Sharp Trial in the Fall of 2016.

9 6. None of the employees involved with Thomson's former CPT-manufacturing business  
10 still work for Thomson.

11 7. I am the only remaining Thomson employee with any meaningful knowledge about its  
12 former CPT business, and I have developed even more knowledge through my extensive  
13 involvement in the defense of these CRT cases.

14 8. I have been the Thomson representative involved with assisting outside counsel in  
15 preparing its defense to the CRT cases.

16 9. Because no other current employees have knowledge about the former CPT business, I  
17 was designated to testify as the Thomson Fed.R.Civ.P. 30(b)(6) representative. I engaged in  
18 extensive preparations for my two-day Rule 30(b)(6) deposition. I spent more than 130 hours  
19 preparing by attending numerous depositions, interviewing more than 20 individuals, and  
20 reviewing hundreds of documents.

21 10. This preparation was in addition to my extensive prior involvement in investigating and  
22 defending against plaintiffs' allegations from the outset, providing input on case strategy and  
23 briefing, and overseeing all aspects of discovery including locating, gathering and evaluating  
24 responsive, relevant documents and data.

25 11. I am the only individual still employed by Thomson who possesses detailed – indeed *any*  
26 – meaningful knowledge regarding the facts and legal theories that support Thomson's defenses  
27 to the plaintiffs' claims.


1 12. I will serve as Thomson's corporate representative at trial. I will be present in the  
2 courtroom for what is expected to be a multi-week trial, answering questions posed by Thomson's  
3 outside counsel, advising them on trial strategy, and otherwise actively participating in  
4 Thomson's defense.

5 13. Because there are no other remaining Thomson employees with knowledge of its former  
6 CPT business, I have no suitable replacement as Thomson's corporate representative.

7 14. I believe Thomson would be severely prejudiced if it was forced to proceed to trial at a  
8 time when it would be physically impossible for me to actively participate in Thomson's defense.

9  
10 I declare under penalty of perjury that the foregoing is true and correct.

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12 Executed this 25th day of April, 2016 at Indianapolis, Indiana.

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15 Meggan Ehret  
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